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Attorneys for Defendants TDK Corporation,  
TDK-EPC Corporation, and TDK U.S.A. Corporation

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO: ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER TEMPORARILY LIMITING  
ACCESS TO SERVICE COPIES OF  
DIRECT PURCHASER PLAINTIFFS'  
UNREDACTED CONSOLIDATED  
COMPLAINT**

WHEREAS the deadline for the Direct Purchaser Plaintiffs to file and serve a consolidated complaint is November 14, 2014 (Dkt. No. 342); and

WHEREAS Plaintiffs intend to file motions to seal portions of the consolidated complaints;

THEREFORE, the undersigned parties hereby request that the Court enter the following Stipulation as the Order of the Court:

1           1.       Direct Purchaser Plaintiffs will serve the unredacted version on counsel for the  
2 undersigned Defendants by email on November 15, 2014.

3           2.       The parties agree that pending the Court's ruling on Plaintiffs' motions to seal and any  
4 motion filed by the United States, counsel for the undersigned Defendants will not share the unredacted  
5 version of the consolidated complaint with anyone except: (1) any outside counsel (and their  
6 employees) who are advising defendants on the litigation; and (2) employees of the defendants who are  
7 in the legal department or its equivalent.

8           3.       The parties agree that the undersigned Defendants' agreement to limit access to the  
9 consolidated complaint on an interim basis does not constitute any agreement or concession that the  
10 motions to seal should be granted. Defendants' agreement to limit access to the unredacted  
11 consolidated complaint is purely an interim compromise pending the Court's rulings. Defendants  
12 remain free to take any position regarding Plaintiffs' motions to seal, and any motion filed by the  
13 United States, including opposing the motions.

14           IT IS SO STIPULATED.

15  
16 Dated: November 15, 2014

JOSEPH SAVERI LAW FIRM, INC.

17 By: /s/ Joseph R. Saveri

18 Joseph R. Saveri

19 Joseph R. Saveri (State Bar No. 130064)

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25 *Interim Lead Class Counsel for Direct Purchaser Plaintiffs*

1 Dated: November 15, 2014

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2  
3 By: /s/ J. Clayton Everett, Jr.  
J. Clayton Everett, Jr.

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9 *Attorneys for Defendants TDK Corporation, TDK-EPC*  
10 *Corporation, and TDK U.S.A. Corporation*

11 I attest that concurrence in the filing of this document has been obtained from each of the other  
12 signatories above.

13 Dated: November 15, 2014

14 By: /s/ J. Clayton Everett, Jr.  
J. Clayton Everett, Jr.

15 **PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.**

16  
17 Dated:

18 By: \_\_\_\_\_  
Honorable James Donato  
United States District Judge